Scott R. Campbell, FPE Administrator

William R. Hall, Jr. i-mergency Management Coordinator.

Randolph Waesche, Jr., ENP

Emergency Communications Coordinator



or are coefficient.

Office of Public Safety **Support Services**

Carroll County Government 225 N. Center St., Westminster, MD 21157 410-386-2260, Fax: 410-848-3794 TT: 410-848-9747, ccgovernment.carr.org

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, DC 20554

July 13, 2007

RECEIVED & INSPECTED JUL 17 2007 FCC - MAILROOM

RE: WT Docket No. 02-55

Dear Ms. Dortch.

Carroll County Maryland supports Fairfax County Virginia's Petition for Waiver of the Commission's June 26, 2008 completion date for Wave 1 rebanding (WT Docket No.02-55). Specifically, we share Fairfax County's concern that the current timeline specifies that licensees must assume all rebanding costs incurred past that date. Unless the date is adjusted, Carroll County will also be unable to execute a Frequency Reconfiguration Agreement due to our inability to commit to millions of dollars of rebanding expenditures that may not be subject to reimbursement.

Carroll County Maryland has been proceeding as fast as planning, vendor schedules, and regional activity is allowing. As demonstrated in Fairfax's petition, most of our area's licensees are not only affected by the interlocking schedules of one region, but due to overlapping memberships are affected by both the National Capital Region and the Baltimore Metropolitan Region. Therefore, Fairfax's accurate determination that circumstances have converged to render June 26, 2008 as an impossible implementation goal applies to each and every licensee in both of those large interoperability regions.

Although Carroll County Maryland doesn't yet have a determination of when we can be finished with our own rebanding efforts, we are certain that completion by June 26, 2008 is impossible. Within the next few months we should be able to project a revised completion date and if still necessary, we will file a petition for waiver on our own behalf.

Meantime, we feel that Fairfax's estimation of July 10, 2010 is a reasonable date for rebanding completion and we urge favorable disposition on Fairfax's petition. We also ask that the Commission consider the extension of any favorable ruling to all other licensees within the two regions identified in this discussion.

Sincerely.

ott R. Campbell, Admir strator Carroll County Office of Public Safety

cc: Steve Powell, Chief of Staff Kim Millender, County Attorney Ted Zaleski, Director of Management and Budget List ABCDE

CARROLL COUNTY

a great place to live, a great place to work, a great place to play